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July 27, 2022

Hon. Kilo A. Matsumoto
United State District Court
Eastern District
225 Cadman Plaza East,
Brooklyn, NY 11201

Re: CARLA BARKER, v. IZIA ROKOSZ, JANELLE DEFREITAS, et al; 19 Civ. 00514 (KAM) (JRC) - Request for Adjournment to Submit Answer in Opposition to Plaintiff's Motion to Strike Answer of Defendant Janelle Defreitas

Dear Judge Matsumoto:

As a follow to my correspondence dated June 17, 2022, addressed to Your Honor's Office seeking an adjournment to respond to court's directive for Janelle Defreitas, Co-Defendant, and my new client, to file opposition papers in response to Plaintiff's Motion to Strike her Answer as a result of my being retained on the same day that the motion was due. I would like to renew that application for an extension of time to respond, particularly in light of the fact that I was not aware that the court had granted the extension of time to submit an Answer to the opposing party on June 22, 2022 (ECF No. 261) with said papers to be served upon the Plaintiff by July 6, 2022 and opposition reply papers to be filed with the court by Plaintiff on July 13, 2022. In fact, I did not become aware of the Order until on or about July 11, 2022, upon the return from my family vacation when I received a call from Belinda Luu, Esq., Counsel for Plaintiff, advising me of the extension and the corresponding deadlines. I advised Attorney Luu that I would be seeking a further extension in light of the circumstances and inquired as to whether she would be willing to consent to same. I was advised by Ms. Luu that she would get back to me on the request, but I did not hear back.

Upon my review of the electronic file entries on Pacer for this case, it is clear that there are more than 260 entries, inclusive of transcripts, that I will have to review just to be able to acquire a basic understanding of the case and to be able to properly represent Ms. Defreitas in responding to the pending Motion to Strike her Answer and other pleadings. I am also involved

in several other protracted litigation matters in NYS Supreme, and Surrogate Court wherein I have been required to appear in court on almost a daily basis in addition with having to submit post trial briefs and memoranda of law on several matters within the next 5 business days.

Based upon the foregoing circumstances, I would like to respectfully request that Your Honor grant me a further adjournment so that I may become familiar with the case and to provide proper representation to Ms. Defreitas in this matter.

Respectfully submitted,

/s/ Andrew Maloney

Andrew Maloney, Esq.

Cc: Counsel of Record (via ECF)